1	Sarah Grossman-Swenson, SBN 11979
2	Kimberley C. Weber, SBN 14434 Luke N. Dowling, SBN 16524
3	McCRACKEN, STEMERMAN & HOLSBERRY, LLP 1630 South Commerce Street, Suite A-1
4	Las Vegas, Nevada 89102 Phone: (702) 386-5107
5	Facsimile: (702) 386-9848
6	Email: sgs@msh.law kweber@msh.law
7	ldowling@msh.law
8	Attorneys for Plaintiff Tatyana Silva
9	Scott M. Mahoney, SBN 1099 Fisher Phillips
10	300 S. Fourth Street, Suite 1500
11	Las Vegas, NV 89101 Phone: (702) 252-3131
	Facsimile: (702) 252-7411
12	Email: smahoney@fisherphillips.com
13	Brett M. Wendt (Pro Hac Vice)
14	Fisher Phillips
15	1125 17th Street, Suite 2400 Denver, CO 80202
	Phone: (303) 208-3635
16	Facsimile: (303) 218-3651
17	Email: bwendt@fisherphillips.com
18	Amanda E. Brown (<i>Pro Hac Vice</i>) Fisher Phillips
19	500 Crescent Court, Suite 300
20	Dallas, Texas 75201 Phone: (214) 220-8336
21	Facsimile: (214) 220-9122
22	Email: amebrown@fisherphillips.com
23	Attorneys for Defendant Panasonic Corporation of North America
24	
25	
26	
27	
28	

12

13

14

15

16

17

18

19

20

21

22

23

24

25

26

27

28

1 UNITED STATES DISTRICT COURT 2 DISTRICT OF NEVADA 3 Tatyana Silva, Case No: 3:23-cv-00556-ART-CBC 4 Plaintiff, **ORDER GRANTING** 5 STIPULATION TO EXTEND REBUTTAL EXPERT VS. 6 **DEADLINE** Panasonic Corporation of North 7 (Second Request) America, Inc., d/b/a/ Panasonic Energy Corporation of North America, Inc., a 8 Delaware corporation; and DOES 1-10, 9 Defendants. 10 11

Plaintiff, Tatyana Silva ("Plaintiff"), by and through her counsel of record, McCracken, Stemerman & Holsberry, LLP, and Defendant, Panasonic Corporation of North America, Inc. ("Defendant"), by and through its counsel of record, Fisher Phillips LLP, hereby stipulate and agree to extend the rebuttal expert deadline as further specified below. This request is based on the following:

- 1. Plaintiff filed her Complaint on November 9, 2023 (Dkt. 1), and Defendant filed its Answer on December 15, 2023 (Dkt. 8).
- 2. The Parties filed a Joint Case Management Report on January 29, 2024 (Dkt. 14), and the Court adopted case management scheduling deadlines on January 30, 2024 (Dkt. 16).
- 3. Pursuant to Local Rule 26-3, the Parties submit the following statements:
 - a. **Discovery Completed.** Since the last Stipulation and Order was filed on February 27, 2025 (Dkt. 40), Plaintiff made her expert disclosures on March 3, 2025.
 - b. **Remaining Discovery.** Rebuttal expert reports and additional depositions of Plaintiff, lay witnesses, medical providers, and experts.

1

2

3

4

5

6

7

8

9

10

11

12

13

14

15

16

17

18

19

28

c. Reason	for	Extens	ion.	Certain	material	s have	been
precautionarily	withh	eld by	Plaint	iff's expe	ert and tl	he Part	ies are
working amical	oly to	resolve t	he issu	e in a tim	ely and ef	ficient r	nanner.
Until the docu	ments	that are	being	withheld	are provio	ded, De	fendant
cannot make a	full ev	aluation	and pr	epare its r	ebuttal ex	pert disc	closure.
The Parties hav	e agre	ed that	Defend	ant's rebu	ttal deadl	ine will	be 30-
days following	the dis	closure o	of the w	ithheld m	aterials.		
d. Curren	t dead	dlines a	nd pr	oposed s	chedule:	The	current
deadline for co	mnlata	disclosi	ire of r	abuttal avi	art testim	ony is	April 3

- deadline for complete disclosure of rebuttal expert testimony is April 3, 2025. The Parties propose to extend Defendant's rebuttal expert testimony deadline to 30-days following the disclosure of the materials withheld by Plaintiff.
- 4. This is the second request for an extension of time to disclose rebuttal expert testimony and is made more than 21 days in advance of the current discovery cut-off date of May 23, 2025.
- 5. This request is made in good faith and not for the purpose of delay. The Parties have been working diligently to resolve the issue of the withheld documents in a timely and efficient matter and additional time is needed for Defendant to disclose its rebuttal expert testimony following the receipt of the withheld documents.

20 Dated: April 3, 2025

21	MCCRACKEN,	STEMERMAN	&	FISHER & PHILLIPS LLP
	HOLSBERRY, L	LP		

22 By:/s/Sara Grossman-Swenson, Esq. By:/s/ Brett Wendt 23 Brett M. Wendt (Pro Hac Vice) Sarah Grossman-Swenson, Esq. Nevada Bar No. 11979 Fisher Phillips 24 1630 S. Commerce Street 1125 17th Street, Suite 2400 25 Suite 1-A Denver, CO 80202 Las Vegas, Nevada 89102 26 Scott M. Mahoney, SBN 1099 Attorneys for Plaintiff Fisher Phillips 27 300 S. Fourth Street, Suite 1500

- 3 -

Las Vegas, NV 89101

Amanda Brown (Pro Hac Vice)
Fisher Phillips
500 Crescent Court, Suite 300
Dallas, Texas 75201
Attorneys for Defendant Panasonic
Corporation of North America

IT IS SO ORDERED.

UNITED STATES MAGISTRATE JUDGE

Dated: April 3, 2025